

Exhibit E

Thomas Deppiesse

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE WESTERN DISTRICT OF PENNSYLVANIA
3 * * * * * * * * * * * * * * * *
4 HORACE CLAIBORNE, SONJIA MONIQUE BOWLIN,
5 TYSHAWN WALKER, DEZRAE KAUHANE, WILLIE SEALS,
6 FREDERICK EPPICH, JEROME SCHOOLFIELD, KRISTINA
7 TRAVIS, JEREMY WINKELS, DANIEL FORRESTER, MARK
8 DAVID GRIFFETH, DOUGLAS RUSSELL, KENNETH
9 BURTON, GERALD GENSOLI, and THOMAS DEPPIESSE,
10 on behalf of themselves and others similarly
11 situated,
12 Plaintiffs,
13 vs. Case No. 2:18-cv-01698-RJC
14 FEDEX GROUND PACKAGE SYSTEM, INC.,
15 Defendant.
16 * * * * * * * * * * * * * * * *
17 REMOTE VIDEOTAPED DEPOSITION OF THOMAS DEPPIESSE
18 January 24, 2022
19 8:43 a.m. to 2:28 p.m.
20 REPORTED BY ANITA KORNBURGER
21 REGISTERED PROFESSIONAL REPORTER
22 * * * * * * * * * * * * * * * *
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1 to your relationship with Wild Bill's besides the
2 two e-mail accounts that you told me about?

3 A. Nowhere else that I can think of.

4 Q. Do you keep any paper files?

5 A. No. The only paper files I keep are for
6 tax purposes.

7 Q. Do you have any text messages to or from
8 Wild Bill's?

9 A. No, not anymore.

10 Q. What about voicemails?

11 A. No, they're all gone. I don't think I
12 had any voicemails anyway from them.

13 Q. What makes you think that you have more
14 payroll documents than what you provided?

15 A. What makes me think?

16 Q. Yes.

17 A. Because I did a search and I saw more.

18 Q. Sir, do you know that you have a duty to
19 preserve potentially relevant documents like your
20 pay information in this case?

21 A. I didn't, but I don't typically delete
22 that stuff.

23 Q. Has anyone instructed you to preserve any
24 potentially relevant information?

25 A. No.